



June 23, 2011

EX PARTE

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Developing a Unified Inter-carrier Compensation Regime, CC Docket No. 01-92; High-Cost Universal Service Support, WC Docket No. 05-337; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; Connect America Fund, WC Docket No. 10-90; A National Broadband Plan for Our Future, GN Docket No. 09-51; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link-Up, WC Docket No. 03-109

Dear Ms. Dortch:

On June 21, 2011, Eric Einhorn and Mike Rhoda (Windstream), Kathy Grillo (Verizon), Michael Saperstein (Frontier), Hank Hultquist (AT&T) and the undersigned met with Zac Katz (Office of Chairman Genachowski), Michael Steffen (Office of the General Counsel) and Patrick Hailey, Sharon Gillett, Rebekah Goodheart and Carol Matthey (Wireline Competition Bureau). We discussed several issues relating to comprehensive reform of the current universal service funding and inter-carrier compensation systems. In particular, we discussed how to ensure that inter-carrier compensation reform properly accounts for the potential to create incentives for behavior that may interfere with the efficient implementation of reform and how that reform can fit into a longer-term vision of an all-IP network. We also discussed legal theories underlying the reduction of current inter-carrier rates. Regarding universal service reform, we discussed how to properly model rate transitions given declining access minutes, transparency of any modeling efforts and how to create efficiency incentives for fund recipients.

Pursuant to Commission rules, please include a copy of this filing in each of the above-referenced dockets.

Sincerely,

Jonathan Banks

c: Zachary Katz
Michael Steffen
Patrick Hailey
Sharon Gillett
Rebekah Goodheart
Carol Matthey